CGB-CC-0693

Joseph E. Dunne III Attorney at Law P.O. Box 9203 Durango, CO 81302-9203

RECEIVED & INSPECTED

MAR 2 8 2007

FCC - MAILROOM

March 27, 2007

VIA OVERNIGHT EXPRESS

Ms. Marlene H. Dortch Secretary Federal Communications Commission 9300 East Hampton Drive Capitol Heights, MD 20743

RE: Request For Exemption From Closed Captioning Requirements Submitted by Anchorage Baptist Temple

Dear Ms. Dortch:

Transmitted herewith on behalf of Anchorage Baptist Temple ("ABT") is an original and two copies of its Petition for Exemption From Closed Captioning Requirements submitted pursuant to section 79.1(f) of the Commission's Rules and Regulations.

ABT respectfully requests that the enclosed copy of this petition, marked "COPY," be stamped as received and returned to the undersigned in the enclosed stamped self-addressed envelope.

Should any questions arise concerning this matter, kindly contact the undersigned directly.

Respectfully Submitted,

ANCHORAGE BAPTIST TEMPLE

Joseph E. Dunne III

∕Its Attorney

xc: Tom Steigleman

RECEIVED & INSPECTED

MAR **2** 8 2007

BEFORE THE

Federal Communications Commission FCC - MAIL ROOM

WASHINGTON, D.C. 20554

In Re Request For Exemption From Section 79.1 of the Commission's **Rules and Regulations**

To: The Media Bureau

PETITION FOR EXEMPTION FROM CLOSED CAPTIONING REQUIREMENTS

Anchorage Baptist Temple ("ABT"), a Baptist Church and video programming provider within the meaning of section 79.1 (a)(3) of the Commission's Rules and Regulations, 47 C.F.R. § 79.1(a)(3), by its undersigned attorney and pursuant to section 79.1(f) of the Commission's Rules and Regulations hereby submits this Petition for Exemption From Closed Captioning Requirements on the basis of undue burden ("Petition"). In support of its Petition, ABT shows and states as follows.

■_The Petitioner'

1. ABT is a Baptist church and a non-profit tax exempt organization affiliated with the Baptist Bible Fellowship. The Church has approximately

⁴. The factual representations made in this petition are taken from the Verified Statement of Allen Prevo, a Pastoral Minister of ABT, included in Exhibit 1 to this petition.

- 1,800 congregants, and is an active place of worship with many ministries, as well as an affiliated Christian School. The program in question has no name or title, but consists of the Sunday morning service of ABT and is broadcast each Sunday of the year. To those not familiar with Baptist services, the service features congregational and choir singing and a sermon delivered by the Pastor. In his sermons the Pastor often discusses local problems, or issues that are current in the community as part of his teaching and preaching of Biblical scripture. As noted in the Verified Statement of Allen Prevo, attached as Exhibit 1, during a sermon that he remembers the Pastor discussed the problems of drugs in the community, which is a major problem in Anchorage, and told of a young woman who lost her baby because of her addiction to Methamphetamine.
- 2. As part of its ministry ABT produces and broadcasts an edited copy of its Sunday worship service. The program is edited to run 58 minutes and 55 seconds, and is seen on a number of television stations and other media outlets in the community, including: KIMO, channel 13, Anchorage; KCFT-LP, an affiliated Class A station on channel 35 in Anchorage; and, on GCI cable system in Anchorage. KIMO broadcasts the program at 8:00 a.m. and 2:00 p.m. on Sunday, at 1:00 p.m. on Monday, and at 12:00 a.m. on Saturday. The broadcast on Sunday at 2:00 p.m. is essentially following the conclusion of the service. KCFT-LP broadcasts the service at 10:00 a.m., 3:00 p.m.;

and 10:00 p.m. every day. None of these entities pays ABT for its program, and the revenues from the program equal approximately five percent of the program's production cost. See Section II(A) *infra*. ABT is obviously not producing or distributing the program for a commercial purpose.

- 3. An ABT staff member, Allen Prevo, and 14 volunteer members of the congregation are involved in the production of ABT's church service program. As part of Mr. Prevo's job he conducts prayer and devotional services before each church service. Mr.Prevo's yearly salary is \$54,000, and he estimates that approximately 35 percent of his time is devoted to the production of the program. Accordingly, \$18,900 per year is attributable to his services producing the program. His other duties for ABT include supervising the Drama Department, producing TV announcements and commercials highlighting ABT's special events, serving as the media purchasing agent, and coaching the basketball team for ABT's associated Christian School.
- 4. In addition to Mr. Prevo's salary ABT pays approximately \$450 for disposable items used in the production of each program. ABT generates approximately \$2,000 a year from the sale of tapes of the service to congregants who want to memorialize the fact that they appeared on televison.
- 5. The electronic newsroom method of closed captioning is not available in Anchorage, and ABT contacted Professional Video and Tape in Oregon to get

an estimate of the cost of closed captioning equipment, assuming that ABT could find qualified people to operate the equipment. The price quoted for the equipment was \$19,175. Operation of this equipment would require the services of a trained operator. ABT was unable to find anyone in Anchorage qualified to operate the equipment, but Mr. Prevo was put in touch with a video programmer in Tennessee who communicated to him that they pay \$14.00 per hour for a closed captioning equipment operator. Anchorage wages would undoubtedly be higher, and that assumes that an operator could be found who would be willing to work one hour a week on a Sunday. 6. To sum up, one year's program production costs include: \$18,900 for the apportioned amount of Mr. Prevo's salary and \$23,000 per year for disposable items, for a total of \$42,300. To be set against that figure is \$2,000 a year in tape sales which could be called revenues. The cost of producing the program in the first year would be \$19,903, approximately 49.3 percent of the first year's cost of producing the program

11. The Factors Under Which Petitioner's Exemption Claim Must Be Considered

7. Section 713 of the Communications Act of 1934, as amended,

...provides the Commission with authority to grant a petition for exemption from the closed captioning requirements upon a showing that the requirements would result in an "undue burden" for the program provider or owner. Congress defined "undue burden" to mean significant difficulty or expense. When

determining if the closed captioning requirements will prove an undue burden, the statute requires the Commission to consider the following factors: (1) the nature and cost of the closed captions for the program; (2) the impact on the operation of the provider or program owner; (3) the financial resources of the provider or program owner; and, (4) the type of operation of the provider or program owner. Outland Sports, Inc., 16 FCC Rcd 13605, 24 CR 158, ¶3 (Cable Services Bureau, 2001).

Accordingly, ABT will discuss its case for an exemption under each of the numbered factors below.

A. The Nature and Costs of the Closed Captioning

- 8. Because of the fact that the program is scheduled for broadcast almost immediately after the morning worship service concludes, to permit delivery of the program to KIMO in time for broadcast, closed captioning for the worship service will have to be essentially "live" or real-time, which increases costs and limits accuracy. Moreover, accuracy is clearly important to the provider of religious programming. Mistaken captions which contradict the theological point being made, or which introduces colloquial or off-color comments into the information presented, have the capacity for completely destroying the point and impact of the presentation. As noted above, ABT is a non-profit organization, and the production of the program does not have a commercial purpose
- 9. As noted above, the equipment necessary to close-caption ABT's programming will cost approximately \$19,175. The cost of providing an operator who is available for one hour on a Sunday, assuming such a person

can be found, is conservatively estimated at \$14 an hour, or \$728 per year.

The total first year's cost would be \$19,903.

Under any objective view of the facts a 50 percent addition to program production costs necessary to a closed caption its programming is clearly a significant burden for ABT to shoulder. While the Commission refused to categorize 40 percent of the cost of program production as "economically burdensome," see <u>Outland Sports, Inc.</u>, *supra*, clearly an expense equal to half of the of program production is a "significant difficulty or expense" within the meaning of section 79.1 of the Commission's rules.

10. Nor is ABT in a position to defray some of its closed captioning costs by obtaining sponsors willing to pay a fee for a billboard or graphic display during a program. Not only are such advertising messages or graphic displays inappropriate and offensive during a worship service, but it is highly unlikely that a commercial sponsor will wish to advertise its product during a religious service. ABT believes the amounts which might be obtained to help defray the costs of its closed captioning will be negligible to nil. Likewise, it is important to emphasize that ABT is a non-profit organization and the production of the program has no discernible commercial purpose. The Commission has taken a petitioner's non-profit status and lack of commercial purpose as an important factor in determining whether closed captioning imposes a "significant burden" on the petitioner.

Anglers for Christ Ministries, Inc., 21 FCC Rcd 1

11. Even were obtaining commercial sponsors to fund ABT's closed captioning efforts, or were obtaining scholarships or grants a realistic possibility for ABT, seeking such commercial revenue, or sponsorships or grants, is a task clearly beyond the capability of ABT's present staff of one paid employee devoting 35 percent of his time to the television program, and who has numerous other duties which are important to a religious organization, and which may have precedence over economic considerations. Hiring more personnel to pursue the wholly speculative and unproven possibility of obtaining sponsors for closed captioned programming, or scholarships or grants to support such programming is not a prudent use of ABT's limited resources. There is little likelihood that the income generated by sponsors or grants obtained by additional employees will cover the cost of their salaries.

B. The Impact on the Operation of the Program Owner

12. As shown in section II(A) above the burden which would be imposed on ABT to close caption its programming is significant. Closed captioning its programming would impose a 50 percent increase in the cost of an hour of program production during the first year. In addition, the benefits which would be gained by closed captioning its programming would

be disproportionate to its exorbitant cost. As noted above, in a religious presentation the visual accuracy of the essential religious information becomes vitally important. If the closed captions contain inaccurate information, the resulting viewers' confusion would be great and counterproductive to the programs whole purpose for being. Similarly, the impact on viewers subjected to inaccurate and inappropriate colloquial or off-color commentary can be imagined. ABT cannot now make any realistic estimate concerning how many errors closed captioning will inject in religious presentations, or how accurate such closed captioned will be, particularly since it is not likely to have much of a choice from among skilled operators. If mistakes are made in the closed captions the potential for negating the purpose of ABT's programming and offending its viewers is significant.

C. The Financial Resources of ABT

13. A Balance Sheet for ABT is included in Exhibit 2 of this petition.

Clearly ABT has substantial financial resources. What the statement does not reveal, however, are the obligations that ABT has to its other ministries, and its plans for further necessary construction and expansion, all which are vital to ABT's essential purpose as a non-profit religious organization. In addition ABT has an affiliated corporation, Alaska Broadcast Television, Inc.²

². The Pastor, officers, and Board of Deacons of Anchorage Baptist Temple automatically become the officers and directors of Alaska Broadcast Television, Inc. Anchorage Baptist Temple is, accordingly, the controlling entity of Alaska Broadcast Television, Inc.

which holds the construction permit for noncommercial educational channel 9 in Anchorage, Alaska, and has a paired channel 26 for DTV operation. Anchorage Baptist Temple will provide the financial wherewithal to construct the stations, although this obligation is not shown on its Balance Sheet. Were ABT to construct both facilities its construction obligations would run into the millions. As it is, Alaska Broadcast Television, Inc. on March 12, 2007 filed an application for a construction permit for DTV channel 26, and will soon be filing a petition with the Commission requesting that it receive a waiver of its obligation to construct both a companion channel analog facility and a DTV facility, given the short time before the transition to digital television occurs in February, 2009. Alaska Broadcast Television, Inc.'s financial statement is included in Exhibit 3, and shows an 11 month "profit" of \$5,554, defined as the total amount of income over expenses, and a cash reserve of \$200,236. These figures clearly indicates that Alaska Broadcast Television, Inc. does not have the financial wherewithal to finance the construction of even one full power television, not to mention two, nor to fund the operation of the station when the stations commence operating and before it has an opportunity to develop funding mechanisms for the station.

D. The Type of Operations of the Program Owner

14. In making a determination of whether complying with the closed

captioning requirements imposes an "undue burden" on a program provider the Commission must also evaluate the benefits to the hearing impaired promised by closed captioning the programming. Anchorage is a comparatively small television market, number 155 in the Neilsen DMA Market Atlas, *Broadcasting and Cable Yearbook 2007*, p. B-135, and includes only 141,290 households, of which 98,960 are located in Anchorage. Accordingly, the number of hearing impaired who would benefit from the the closed captioning of ABT's program is very small. This number is reduced even more given the type of program which is being broadcast, which admittedly does not have broad appeal.

15. There is also no question that closed captioning ABT's program will impose a disproportionate burden on the petitioner without a proportional benefit to hearing impaired consumers. Closed captioning its program imposes a heavy cost on ABT. of closed captioning its programming as outlined in section II(A) above, and this burden will be incurred to benefit a vanishingly small number of viewers.

111. Conclusion

15. The evidence adduced above unquestionably shows that the costs of providing closed captioned programming imposes a significant burden on ABT, given the resources devoted to producing the program. The prospective cost of closed captioning its program equals a full 50 percent of

cost of program production during the first year. Moreover, the possibility of inaccurate captions has the danger of confusing or negating the theological message of the service, which is essential purpose for its being broadcast. Moreover, inappropriate or off-color captions run a serious risk of offending and alienating viewers. ABT, accordingly, respectfully requests an exemption from closed captioning it program on the basis of the undue burden that such closed captioning will impose on it.

Wherefore, the foregoing considered, Anchorage Baptist Temple respectfully requests that the Commission declare it exempt from complying with the closed captioned requirements of section 79.1 of the Commission's Rules.

Respectfully Submitted,

ANCHORAGE BAPTIST TEMPLE

Jøseph Æ. Dunne III

∕Its Attorney

Joseph E. Dunne III Attorney At Law P.O.Box 9203 Durango, CO 81302-9203 (970)385-7312 lawman@animas.net

ANCHORAGE BAPTIST TEMPLE

EXHIBIT 1 VERIFIED STATEMENT OF ALLEN PREVO

Verified Statement of Allen Prevo

- I. Allen Prevo, make the following statement under penalty of perjury of the laws of the State of Alaska and the United States of America. The statements made below are made of my own personal knowledge, or were communicated to me in the course of my employment for the Anchorage Baptist Temple.
- Lam an employee of Anchorage Baptist Temple (hereinafter "the ı Temple") The Temple affiliated with the Baptist Bible Fellowship with approximately 1,800 congregants. The Temple is an active place of worship and has many ministries. I am a Pastoral Minister who is responsible for supervising the production of a TV program of the Temple's Sunday worship service. To those not familiar with Baptist worship services the service consists of congregational and choir singing and a sermon usually preached by the Pastor. Our Pastor often discusses problems in our community as part of his explication of the message from scripture. For example, I remember some time ago that the Pastor discussed the problem of drugs in the community, citing the example of a young mother who had had her baby taken away from here because of her continually getting high on Methamph tamme.

Lam responsible for the lighting and other technical details of the production and for supervising the 14 volunteers members of the congregation who help me in the production of the church service. I am responsible for duplicating the services and distributing the tapes for later broadcast. As part of my job I conduct prayer and devotional services with the volunteers before each church service. My other duties include supervising the Drama Department of the Temple, producing television commercials for the Temple's special events, and serving as a methal purchasing agent. I also coach the basketball team for the Temple's affiliated Christian School. My yearly salary is

\$54,000, and I estimate that approximately 35 percent of my time is spent preparing for and producing the Temple's worship service and supervising the volunteers who help me in the production of the worship service.

- The program we produce of the worship service is 58 minutes and 55 seconds long, and is seen on: full power station kIMO, channel 13, Auchorage, Alaska; on Class A television station KCFT-LP, channel 35, Auchorage, Alaska; and on GCI Cable System. The worship service is broadcast on kIMO at 8:00 a.m. and 2:00 p.m. on Sunday, at 1:00 a.m. on Monday, and at 12:00 a.m. on Saturday. The worship service is broadcast on KCFT-LP at 10:00 a.m., 3:00 p.m., and 10:00 p.m. every day. The service is cablecast at 8:00 a.m. on Thursday on GCI Cable System. Since the church service lasts until approximately 1:00 p.m. on Sunday, we have to finish the production and run a tape over to KiMO by 2:00 p.m. each Sunday for broadcast. The worship service is not distributed to any other television market.
- In addition to tay safary, the Temple pays approximately \$450 for each worship service for disposable items used in the production of the program. The production equipment used to produce the worship service cost the Temple \$1,600,000 and is not used for any other purpose other than producing the worship service. The Temple generates revenues from the safe of the tapes of the worship service of approximately \$2,000 per year, consisting almost entirely of safes to people purchasing a copy of the worship service to send to a friend usually because they appeared in the worship service. The Temple receives no revenue from the broadcast of the worship service on KIMO, KCFT LP, or GCT Cable.
- 5. I was fold by other relevation stations in the Anchorage television market—that the electronic newsroom method of closed captioning was not available in this market. To get an estimate

of the cost of equipment to close caption our program I contacted Professional Video and Tape in Oregon. They sent me an estimate of the cost of equipment necessary to close caption the program which I have attached. The cost for the equipment would be \$19,175.00. This equipment would require the services of a trained operator. I was unable to determine the cost of such an operator in the Anchorage market, but our attorney put us in contact with a programmer in Termessee who told us that the cost of such an operator would be \$14.00 per hour, assuming that an operator would be available to be hired for only one hour a week on a Sunday. The apportioned amount of my salary attributable to the production of the worship service is 35 percent of my yearly salary, or \$18,900. To this would be added the weekly costs of materials and the distribution of the program, conservatively estimated at \$450 per week, or \$23,400 per year. Accordingly, the cost of producing the program, including a conservative estimate of the portion of my salary attributable to producing the program, would be The added cost of closed captioning the program during the first year would be approximately \$20,000, or roughly 50 percent of the present cost of producing the program.

Executed by me this 27 day of De

day of December 2006.

Allen Prevo

PROFESSIONALVIDEO &TAPE

Sales Quote

10340 SW Nimbus Avenue, Suite A Tigard, Oregon 97223 (503) 598-9142 (503) 598-9172 (fax)



Bill To:					Ship To:				
		Anchorage Baptis	t Temple						
		Mr. Matt Barth							
				7					
				1	"				
Sales	person:	Brad Fisher (BMF)	Date:	12/21/2005		**************************************			
	to PVT:	UPS Ground	Phone:						
	ent Terms:	COD	PO #:	e-mail;					
	to Customer:			Notes:	3% Lost of Cash D			Cards	i
FOB:					Prices subject to cl	0.0000000000000000000000000000000000000		00000000000	
Qty	Manufacturer	Model Number	Description			Price \$	Ea.	Exten	d
				Closed Captioning System				\$	=
1	Evertz	8084AD	Analog and SD	•	\$	5,500.00	\$	5,500.00	
1	Evertz	PC-HW-CAP	DRC-Stream 50	DRC-Stream 500 WM9 video and audio				\$	1,500.00
			capture PCI ad	apter	\$		\$	-	
1	Evertz	PA-SW-LITE	ProCAP Lite Au	ware Only,	\$	3,000.00	\$	3,000.00	
			1 Station Licen	se, Roll-L	Jp EIA-608 and	\$		\$	-
			Avid	Avid					=
1	Evertz	PT-SW-LITE	ProCAP Transfe	er Softwa	re Only,	\$	900.00	\$	900.00
		-	1 Station licens	se, Suppo	\$	-	\$	-	
			TDS, Cheetah,	NCI files		\$	-	\$	-
1	Evertz	PT-HW-TC	ProCAP Transfe	\$	875.00	\$	875.00		
			Adrienne PCI-V	LTC/RDR	Universal	\$	-	\$	
1	Evertz	PACT-HW	ProCAP Author	and Transfer	\$	7,400.00	\$	7,400.00	
			Hardware, IBM	l Desktop	Computer	\$	-	\$	
			with DRC-Strea	m500, Ti	me Code	\$	-	\$	
			Reader			e		¢	
						\$	-	\$	
		•					Sub-total:	\$	19,175.00
Purch	aser Print		Signature Date			-	Ship & Insure:	\$	<u> </u>
		e noted. Warranty on all new equipment is finit ned equipment after management approval.	ted to the established manufacturer's warran	ty at the time of sale			Handling:	\$	
_ u ed (#250)	oresid mende sin abbit ou se jegn	нец сомучиет высотнатизуютного воря ОУМ.					Sales Tax:	¢	19 175 00
							Granu (Otal:	LD.	19.170.00

ANCHORAGE BAPTIST TEMPLE

EXHIBIT 2

UNAUDITED BALANCE SHEET OF ANCHORAGE BAPTIST TEMPLE

9:p AM 02/26/07 Accrual Basis

Anchorage Baptist Temple Balance Sheet

As of December 31,2006

	Dec 31, 06
ASSETS	
Current Assets	
Checking/Savings	
Wells Fargo	2,118,951.89
SmithBarney	1,048,579.28
Trusts 8 Annuities	
Lincoln Benefits	1,764,691.03
Minnesota Life	1,752,338.28
Pershing	201,007.44
Total Trusts & Annuities	3,718,036.75
CD's 8 Marketable Securities	
Northrim	427,338.00
Securian *	2,984,939.09
Wells Fargo	330,000.00
Marketable Securities	16,666.00
Total CD's 8 Marketable Securities	3,758,943.09
Total CheckinglSavings	10,644,511.01
Accounts Receivable	
Short Term Accounts Receivable	
ACS Receivables	89,423.63
KCFT Receivables	294.90
CBI Receivables	26,841.06
TB\$ Receivables	559 35
Total Short Term Accounts Receivable	117.118.94
Total Current Assets	10,761,629.95
Other Assets	., . ,
Long Term Receivables	
Scarborough	37,324.27
Gallagher	12,481.23
Total Long Term Receivables	49,805.50
Total Other Assets	49,805.50
TOTAL ASSETS	10,811,435.45
LIABILITIES 8 EQUITY	
Liabilities	
Current Liabilities	153,066.24
Equity	
General Fund	792,969.85
Mission Fund	106,841.91
Building Fund	247,553.49
TBS Fund	20,650.51
General Reserve	9,490,353.45
Total Equity	10.658.369.21
TOTAL LIABILITIES & EQUITY	10,811,435.45

Our Building is valued between 50 - 70 Million we have nothing set aside for depreciation all of our buildings are over 10 to 20 years old accept for one portion built 4 years ago.

ANCHORAGE BAPTIST TEMPLE

EXHIBIT 3

UNAUDITED STATEMENT OF INCOME, EXPENSES AND RESERVES OF ALASKA BROADCAST TELEVISION, INC.

					Ko	THE PERSON LAND AND ADDRESS OF							
			er er Er er Ro	e Ole Per	lucome s		italia Secondo			ing Hekur s Literatus kang	ne de Polis de Laceste Calo		
	Jan-06	Feb-06	Mar-06	Apr-06	May-06	Jun-06	Jul-06	Aug-06	Sen-06	Oct-06	Nov-06	YTD	YTD 200
KCFT Income				·			ļ 			300	1101-00		
Program	45	20 :		20			Ļ <u>.</u>	·					
R.P. Program	11,873	4,514	4,092	6,495	4 000		40		101	32	14,379	14.637	41
Donations			4,032	0,495	4,606	8,278	7,850	6,670	15,382	5,228	5,849	80,835	59,70
P.J.'S	862	1,095			. 7.1		<u> </u>						96
Spot Sales		1,090		<u> </u>			251				-	2,207	2,09
Reserve Transfer			····	<u> </u>							-		
Church Offerings				·			<u> </u>				-	-	
Interest	305	205	207	- 1		-		- <u></u>			-	- 1	
Other	303	305	287	311	737	495	465	505	235	125	22	3,793	3,11
KCFT Total Income	13.085	50241		<u> </u>	<u> </u>	-	-				-		3,02
ACT TOTAL TACOME	13.085	5,934	4,379	6,826	5,343	8,773	8,605	7,175	15,718	5,385	20,250	101,472	69.3
CFT Expense		i		·					<u></u>				
Vages			:					:					
Sales Training			- :										
Employee Benefits					-						<u>-</u>		15
Administrative Account								- :		• 1	_		1,30
Consultant & Tax Prep.		-	:						25		- }	25	43
Research & Development					-	300	·	3,700		4,418		8,418	85
Travel	— 								<u> </u>	300	-	300	
Production				······································	-	·	-				-	-	1,04
Advertising	19	19 :					-	99 :	-	4,000	18,000	22.099	79
Office Supplies			- :	37	19	19	19	20	20	20	20	208	52
Postage	1,328	296			<u>-</u>	252				6 9 :	-]	321	1,07
Printing	1,020	290 :				285		51	. <u> </u>	-	118	2.089	4,72
Fundraising								<u>-</u>		-	-		
Miscellaneous	370				•	- !				340	-	340	
Bank Fees	6					121	-	220	<u> </u>	-	76	787	3,64
Program	<u> </u>	5 1	6 i	170	503	6	202	291	257 i	388	44	1.878	
Associations	240	99 !			6,001	- ;		_ :	7,600 (- 1	-	13,700	7,60
New Equipment	349	79		• • • • • • • • • • • • • • • • • • • •		587	<u>-</u>		-	-	158	1,173	
Office Utilities	<u>-</u>					<u> </u>		453	- 1	• ,	1,186	1.639	2,03
Maintenance	700	647								- 1	-]		
Site Maintenance	300	647		211 :		6.393	81	298	- !	.	-	8,329	3,85
Tower Site Rent	2,000 i	2.000	300 i		<u>.</u>	200	-	- 1				800	40
Insurance	2,000	2.000	2,000 [2,000 1	2,000	2,000	2,000	2,000	2,000	2,000	2,000	22,000	22,00
Utilities	580					7,385		-		- 1		7.385	5,32
Web Site		836		1,481	722	921	725	556	628	155	1.066	7.670	6,53
KCFT Total Expense	200	3.000		200 :	 	- :	-	200 :			200	800	1.42
VOLET EXPENSE	5,852	3,981	2,306	4,098	9,244	18,468	3,027	7,897	10,530	11,690	22.869	99,962	63,75

Jan-06 Feb-06 Mar-06 April May June July August September November CASH & RESERVES
WELLS FARGO TOTAL CASH & RESERVES 90,276 92,129 93,937 \$ 97,062 \$ 90,444 \$ 80,274 \$ 87,407 \$ 84,199 \$ 89,170 \$ 82,861 \$ 80,238 116,798 117,085 117,350 \$ 117,640 \$ 118,356 \$ 118,831 \$ 119,276 \$ 119,762 \$ 119,980 \$ 119,984 \$ 119,988 119,988 119,200,338 119,200 \$ 119,984 \$ 119,988 \$ 119,200,338 118,031 \$ 119,762 \$ 119,980 \$ 119,984 \$ 119,988